

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

John Malone,

Debtor

Chapter 13

Case No. 24-10885

MOTION TO EXTEND TIME TO FILE SUPPLEMENT TO MOTION FOR SALE

Now comes the Debtor and requests an extension of time for filing his supplement to his Motion for Sale for fourteen days, due to the following:

1. Debtor filed a bankruptcy petition on May 8, 2024.
2. On April 17, 2025, after a hearing, Debtor was ordered to file a supplement to his Motion for Sale.
3. Debtor has met with bankruptcy counsel to review his options including selling with a life estate, selling without a life estate, and a reverse mortgage.
4. Debtor has retained a real estate attorney, Andrew Coppo to negotiate a new Purchase and Sale Agreement for him. Attorney Coppo needs additional time to speak with all bidders and enter into the Agreement.

Wherefore, the Debtor requests the Court allow as follows:

1. An extension of time to file his supplement to his Motion for Sale until May 22, 2025.
2. For such other and further relief as the Court deems just.

Debtor,
by his attorney,

Date: May 7, 2025

/s/ John Ullian
John Ullian, Esq. BBO: 542786
Amy Puliafico, Esq. BBO: 682332
The Law Firm of Ullian & Associates, P.C.
220 Forbes Road, Suite 106
Braintree, MA 02184
781-848-5980

CERTIFICATE OF SERVICE

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the **MOTION TO EXTEND TIME TO FILE SUPPLEMENT TO MOTION FOR SALE** by ECF or mailing a copy of same, postage prepaid, to interested parties listed below.

Carolyn Bankowski
Chapter 13 Trustee Boston
P.O. Box 8250
Boston, MA 02114

Office of the US Trustee
John W. McCormack Post Office & Court House
5 Post Office Square, 10th Floor, Suite 1000
Boston, MA 02109

John Malone
28 Savin Hill Avenue
Dorchester, MA 02125

28 Berkshire Ave LLC
Peter Pasciucco
50 Redfield Street, Suite 201
Boston, MA 02122

American Building Construction, Inc.
82 Union St.
Quincy, MA 02169

Chloe, LLC
c/o Ehrhard & Associates, P.C.
27 Mechanic Street, Suite 101
Worcester, MA 01068

Federal Home Loan Mortgage Corporation
Jason Giguere
Zwicker & Associates, P.C.
80 Minuteman Road
Andover, MA 01810

Federal Home Loan Mortgage Corporation
Joseph Dolben
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The Bank of New York Mellon
Marcus Pratt
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900 Chelmsford Street
Suite 3102
Lowell, MA 01851

Dated: May 7, 2025

/s/ John Ullian
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